

JUL 29 2008

510(k) Summary

Submitter information

Contact person: Philip Liu
Manager, Regulatory Affairs & Compliance

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Date summary prepared: May 1, 2008

Device Trade or Proprietary Names: ADVIA® Chemistry CardioPhase High Sensitivity C-Reactive Protein (hsCRP) Assay
ADVIA® Chemistry CardioPhase High Sensitivity C-Reactive Protein (hsCRP) Calibrators

Device Common/Usual Name or Classification Name: Cardiac C-Reactive Protein, Antigen, Antiserum, and Control Calibrators

Classification Number/Class: NQD / Class II
JIX / Class II

This 510(k) summary of safety and effectiveness is being submitted in accordance with the requirements of 21 CFR 807.92.

The assigned 510(k) number is: K081294

Assay Predicate Devices:

	Predicate Device
Device Name	CardioPhase™ High Sensitivity C-Reactive Protein (hsCRP) on the BNII Systems
Common name	High Sensitivity C-Reactive Protein (hsCRP)
510(k) Number	K033908
Manufacturer	Siemens Healthcare Diagnostics (formerly Dade Behring, Inc.)

Calibrator Predicate Device:

	Predicate Device
Device Name	ADVIA Chemistry wrCRP
Common name	C-Reactive Protein Calibrators
510(k) Number	K022682 (Randox Labs, Ltd)
Manufacturer	Siemens Healthcare Diagnostics (formerly Siemens Medical Solutions Diagnostics)

Device Description:

The ADVIA Chemistry CardioPhase™ High Sensitivity C-Reactive Protein assay is for *in vitro* diagnostic use in the quantitative determination of the concentration of C-Reactive Protein (CRP) in human serum and plasma on the ADVIA Chemistry systems. The CardioPhase™ hsCRP latex reagent is a suspension of uniform polystyrene latex particles coated with anti-CRP antibody. When serum or plasma containing CRP is mixed with the latex reagent, agglutination takes place resulting in an increase in turbidity. This turbidity is measured at 571 nm. The CRP concentration in serum or plasma is determined from a calibration curve that is generated with the calibrators.

The ADVIA® Chemistry CardioPhase™ High Sensitivity C-Reactive Protein Calibrators consist of six (6) levels of protein stabilized matrices containing varying concentrations of recombinant human CRP. The Calibrators have targeted expected values (lot specific) of 0, 0.53, 1.05, 1.58, 5.25, and 10.50 mg/L.

The calibrators (1 mL/vial) are liquid and ready to use. Storage is at 2 - 8°C.

Statement of Intended Use:

The ADVIA Chemistry CardioPhase™ High Sensitivity C-Reactive Protein assay is for *in vitro* diagnostic use in the quantitative determination of the concentration of C-Reactive Protein (CRP) in human serum and plasma (lithium heparin and potassium EDTA) on the ADVIA Chemistry systems. In acute phase response, increased levels of a number of plasma proteins, including CRP, are observed. Measurement of CRP is useful for the detection and evaluation of infection, tissue injury, inflammatory disorders, and associated diseases. High sensitivity CRP (hsCRP) measurements may be used as an independent risk marker for the identification of individuals at risk for future cardiovascular disease. Measurement of hsCRP, when used in conjunction with traditional clinical laboratory evaluation of acute coronary syndromes, may be useful as an independent marker of prognosis for recurrent events in patients with stable coronary disease or acute coronary syndromes.

The ADVIA Chemistry CardioPhase™ High Sensitivity C-Reactive Protein Calibrators are for *in vitro* diagnostic use in the calibration of ADVIA Chemistry systems for the CardioPhase High Sensitivity C-Reactive Protein method.

Comparisons to the Predicate Device:

Assay Similarities

	ADVIA Chemistry CardioPhase™ High Sensitivity C-Reactive Protein (hsCRP) (<i>new device</i>)	Siemens Healthcare CardioPhase™ High Sensitivity CRP on the BNII Systems (formerly Dade Behring) (<i>predicate device</i>)
Intended Use	For in vitro diagnostic use in the quantitative determination of C-Reactive Protein	For in vitro diagnostic use in the quantitative determination of C-Reactive Protein
Specimen Type	Human serum or plasma (lithium heparin, potassium EDTA)	Human serum or plasma (lithium heparin, potassium EDTA)
Calibration	Multi-point (6)	Reference curves generated by multi-point calibration
Standardization	IRMM Reference Material CRM 470	IRMM Reference Material CRM 470
Expected Values	Healthy individuals ≤ 3 mg/L Risk for cardiovascular disease prediction*: Low < 1 mg/L Average 1 - 3 mg/L High > 3 mg/L	Healthy individuals ≤ 3 mg/L Relative risk/average hsCRP: Low < 1 mg/L Average 1.0-3.0 mg/L High > 3.0 mg/L

*AHA/CDC Scientific Statement

Assay Differences

	ADVIA Chemistry CardioPhase™ High Sensitivity C-Reactive Protein (hsCRP) (<i>new device</i>)	Siemens Healthcare CardioPhase™ High Sensitivity CRP on the BNII Systems (formerly Dade Behring) (<i>predicate device</i>)
Assay Principle	Latex-enhanced immuno-turbidimetric assay	Particle enhanced immuno-nephelometry on the BN system
Calibrator	ADVIA Chemistry CardioPhase™ High Sensitivity C-Reactive Protein Calibrators	N Rheumatology Standard SL N Diluent
Reagents	Two liquid reagents, ready to use	Ready to use reagent
Analytical Range (mg/L)	0.16 – 10.0 mg/L	0.10 – 20 mg/L

Calibrator Similarities

	ADVIA Chemistry CardioPhase High Sensitivity C-Reactive Protein Calibrators (<i>new device</i>)	ADVIA Chemistry Wide Range C-Reactive Protein Calibrators (<i>predicate device</i>)
Intended Use	For <i>in vitro</i> diagnostic use in the calibration of ADVIA Chemistry systems for the Cardiophase hsCRP method	For <i>in vitro</i> diagnostic use in the calibration of ADVIA Chemistry systems for the wrCRP method
Matrix	Liquid, ready to use	Liquid, ready to use
Calibrator Levels	6	6
Calibrator Ingredients	Recombinant human CRP in a stabilized protein matrix; contains sodium azide	Recombinant human CRP in a stabilized protein matrix; contains sodium azide
Shelf Life	18 months	18 months
Standardization	CRM-470	CRM-470

Calibrator Differences

	ADVIA Chemistry CardioPhase High Sensitivity C-Reactive Protein Calibrators (<i>new device</i>)	ADVIA Chemistry Wide Range C-Reactive Protein Calibrators (<i>predicate device</i>)
Expected Values	Lot specific: 0, 0.53, 1.05, 1.58, 5.25, and 10.50 mg/L	Lot specific: 0, 2.5, 10, 20, 80, and 160 mg/L
Open Vial (capped) Stability	60 days stored @2-8°C	28 days stored @2-8°C

Performance:

Substantial equivalence was demonstrated by testing several performance characteristics including imprecision, method comparison, interfering substances, serum/plasma equivalency, and analytical range. The following tables summarize the precision (within run), interfering substances, analytical range, and method comparison results.

All of the evaluation studies gave acceptable results compared to the predicate device (this predicate device was used in clinical studies supporting an indication for cardiovascular use). These studies support that the ADVIA Chemistry CardioPhase™ High Sensitivity C-Reactive Protein assay is substantially equivalent to the Siemens Healthcare CardioPhase™ High Sensitivity CRP on the BNII Systems that is currently marketed.

Imprecision

ADVIA Chemistry CardioPhase hsCRP			Siemens Healthcare (former Dade Behring) CardioPhase hsCRP	
ADVIA 1650			BNII	
Level (mg/L)	Within run CV (%)	Total CV (%)	Level (mg/L)	Within run CV (%)
0.21	3.2%	4.2%	0.5	2.5%
1.04	1.1%	1.2%	1.3	3.8%
3.12	0.8%	1.3%	2.1	2.1%
10.27	1.4%	1.6%	14	2.6%
			24	3.9%

Correlation

(y = ADVIA Chemistry CardioPhase hsCRP, x = comparison method/system)

Specimen type, System (y)	Comparison System (x)	N	Regression Equation	Sy.x (mg/L)	r	Sample Range (mg/L)
Serum, ADVIA 1650	former Dade Behring CardioPhase hsCRP on BNII	167	Passing Bablok: $Y = 1.00x + 0.01$	N/A	N/A	0.17 – 9.05
Serum, ADVIA 1650	former Dade Behring CardioPhase hsCRP on BNII	167	Least Squares: $Y = 1.01x - 0.01$	0.13	0.998	0.17 – 9.05

Interfering Substances

(ADVIA Chemistry CardioPhase High Sensitivity C-Reactive Protein on ADVIA 1650)

Interfering Substance	Interferent Conc. (mg/dL)	CRP conc. (mg/L)	Effect (% change)
Hemoglobin	500 mg/dL	0.43	- 9%
Lipids (Intralipid)	1000 mg/dL	0.52	- 7%
Bilirubin, free	30 mg/dL	0.53	4%
Bilirubin, conjugated	30 mg/dL	0.51	0
Rheumatoid Factor	1040 IU/mL	3.15	8%

Analytical Range (Serum/Plasma)

Platform	ADVIA Chemistry CardioPhase High Sensitivity C-Reactive Protein
ADVIA 1650	0.16 to 10 mg/L

Conclusions:

The ADVIA Chemistry CardioPhase High Sensitivity C-Reactive Protein assay is substantially equivalent to other products in commercial distribution intended for similar use. Most notably, it is substantially equivalent to the currently marketed Siemens Healthcare Diagnostics (formerly Dade Behring) CardioPhase High Sensitivity CRP on the BNII Systems (this predicate device was used in clinical studies supporting an indication for cardiovascular use).

The ADVIA® Chemistry CardioPhase High Sensitivity C-Reactive Protein Calibrators are substantially equivalent to other products in commercial distribution intended for similar use. Most notably, it is substantially equivalent to the currently marketed ADVIA Chemistry Wide Range C-Reactive Protein Calibrators (k022682).



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
2098 Gaither Road
Rockville MD 20850

JUL 29 2008

Siemens Healthcare Diagnostics Inc.
c/o Philip Liu
Manager, Regulatory Affairs & Compliance
511 Benedict Avenue
Tarrytown, NY 10591

Re: k081294

Trade/Device Name: ADVIA® Chemistry CardioPhase High Sensitivity C-Reactive Protein (hsCRP) Assay, ADVIA Chemistry CardioPhase High Sensitivity C-Reactive Protein Calibrators

Regulation Number: 21CFR Sec.- 866.5270

Regulation Name: C-Reactive Protein Immunological Test System.

Regulatory Class: Class II

Product Code: NQD, JIX

Dated: May 5, 2008

Received: May 7, 2008

Dear Dr. Liu:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Parts 801 and 809); and good manufacturing practice

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific information about the application of labeling requirements to your device, or questions on the promotion and advertising of your device, please contact the Office of In Vitro Diagnostic Device Evaluation and Safety at (240) 276-0490. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address at <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,



Jean M. Cooper, M.S., D.V.M.

Director

Division of Chemistry and Toxicology

Office of *In Vitro* Diagnostic Device

Evaluation and Safety

Center for Devices and

Radiological Health

Enclosure

Indications for Use

510(k) Number (if known):

Device Name(s):

ADVIA CHEMISTRY CardioPhase™ High Sensitivity C-Reactive Protein Assay
ADVIA CHEMISTRY CardioPhase™ High Sensitivity C-Reactive Protein Calibrators

Indications For Use:

The ADVIA Chemistry CardioPhase High Sensitivity C-Reactive Protein assay is for *in vitro* diagnostic use in the quantitative determination of the concentration of C-Reactive Protein (CRP) in human serum and plasma (lithium heparin or potassium EDTA) on the ADVIA Chemistry systems. In acute phase response, increased levels of a number of plasma proteins, including CRP, are observed. Measurement of CRP is useful for the detection and evaluation of infection, tissue injury, inflammatory disorders, and associated diseases. High sensitivity CRP (hsCRP) measurements may be used as an independent risk marker for the identification of individuals at risk for future cardiovascular disease. Measurement of hsCRP, when used in conjunction with traditional clinical laboratory evaluation of acute coronary syndromes, may be useful as an independent marker of prognosis for recurrent events in patients with stable coronary disease or acute coronary syndromes.

The ADVIA Chemistry CardioPhase High Sensitivity C-Reactive Protein Calibrators are for *in vitro* diagnostic use in the calibration of ADVIA Chemistry systems for the CardioPhase High Sensitivity C-Reactive Protein method.

Prescription Use X
(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use
(21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of In Vitro Diagnostic Devices (OIVD)

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Carol C. Benson
Division Sign-Off

Office of In Vitro Diagnostic Device
Evaluation and Safety

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